

STEPHANIE M. HINDS (CABN 154284)
United States Attorney

THOMAS S. COLTHURST (CABN 99493)
Chief, Criminal Division

MOLLY K. PRIEDEMAN (CABN 302096)
Assistant United States Attorney

1301 Clay Street, Suite 340S
Oakland, California 94612
Telephone: (510) 637-3680
FAX: (510) 637-3724
molly.priedeman@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	NO. 21-cr-429 YGR
)	
Plaintiff,)	STIPULATION AND [PROPOSED] ORDER
)	CONTINUING STATUS CONFERENCE AND
v.)	EXCLUDING TIME UNDER THE SPEEDY TRIAL
)	ACT
RAY GARCIA,)	
)	
Defendant.)	
)	

A status conference in the above-captioned case is scheduled for March 16, 2022. Counsel for the United States and counsel for the defendant jointly stipulate and request that that status conference be continued to May 4, 2022, and that time be excluded under the Speedy Trial Act from March 16, 2022 to May 4, 2022.

The government has produced voluminous discovery in this case, including additional forensic reports that were produced recently. Due to personal circumstances and the amount of discovery produced thus far in this case, defense counsel has asked that a status conference be set for May 4, 2022 so that he can continue to review the discovery and discuss the case with the defendant. At that time, if the case has not been resolved, the government intends to ask that a trial date be set.

1 The government and counsel for the defendant have agreed that time be excluded under and the
2 Speedy Trial Act so that defense counsel can continue to prepare. The government has produced
3 voluminous discovery to defense counsel. For these reasons, the parties stipulate and agree that
4 excluding time until May 4, 2022, will allow for the effective preparation of counsel. *See* 18 U.S.C. §
5 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by excluding
6 time from March 16, 2022 to May 4, 2022, from computation under the Speedy Trial Act outweighs the
7 best interests of the public and the defendant in a speedy trial. 18 U.S.C. §§ 3161(h)(7)(A), (B)(iv).

8 The undersigned Assistant United States Attorney certifies that she has obtained approval from
9 counsel for the defendant to file this stipulation, request, and proposed order.

10
11 IT IS SO STIPULATED.

12
13 DATED: March 15, 2022

/s/ Molly K. Priedeman

MOLLY K. PRIEDEMAN
Assistant United States Attorney

14
15
16 DATED: March 15, 2022

/s/ James Reilly

JAMES REILLY
Attorney for the Defendant

PROPOSED ORDER

Based upon the representations of counsel and for good cause shown, the Court finds that failing to exclude the time from March 16, 2022 to May 4, 2022, would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation and continuity of counsel, taking into account the exercise of due diligence. 18 U.S.C. §3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from March 16, 2022 to May 4, 2022, from computation under the Speedy Trial Act outweighs the best interests of the public and the defendant in a speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time from March 16, 2022 to May 4, 2022, shall be excluded from computation under the Speedy Trial Act and the status conference is continued to May 4, 2022.

IT IS SO ORDERED.

DATED: _____

THE HONORABLE YVONNE GONZALEZ ROGERS
United States District Judge